



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

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OFFICE OF  
ENVIRONMENTAL  
REVIEW AND  
ASSESSMENT

December 29, 2016

Lisa Cresswell, Planning Team Lead  
Bureau of Land Management  
Shoshone Field Office  
400 West F Street  
Shoshone, Idaho 83352

Dear Ms. Cresswell:

In accordance with our responsibilities under Section 309 of the Clean Air Act, the National Environmental Policy Act, and the Council on Environmental Quality regulations for implementing NEPA, the U.S. Environmental Protection Agency has reviewed the Bureau of Land Management Draft Monument Management Plan Amendment and Environmental Impact Statement for the Craters of the Moon National Monument and Preserve (Monument) in Blaine, Butte, Lincoln, Minidoka, and Power Counties, Idaho (EPA Project Number 02-030-NPS).

The draft MMP Amendment/EIS evaluates potential environmental impacts associated with various strategies to manage livestock grazing and sage grouse on BLM-administered lands within the Monument while maintaining values for which the Monument was designated. The planning area, therefore, covers about 275,100 acres of the 753,200-acre Monument. Other landowners within the planning area include the National Park Service (46,3300 acres), the State (8,200 acres), and private land (6,600 acres). The proposed amendment would update the existing 2007 MMP/EIS's grazing management direction to make it consistent with current science, laws, regulations, and policies, especially with regard to greater sage-grouse habitat conservation. If approved as proposed, this MMP amendment would guide livestock grazing in the planning area for at least the next 20 years or beyond.

For analysis of impacts from the proposed action, BLM considered five alternative actions (A-E), including a No Action (p. 32). The draft MMP Amendment/EIS identifies Alternative C as the agency Preferred Alternative. This Alternative would make about 273,600 acres of the planning area available to livestock grazing and sets the maximum number of Animal Unit Months (AUMs) at nearly 38,000. The Alternative would also use livestock grazing as a tool to enhance and protect wildlife habitat and rely on vegetation and wildlife habitat conditions and needs to determine guidelines for livestock use on the planning area, consistent with the 2015 Sage Grouse Approved Resource Management Plan Amendment (ARMPA). Other Alternatives would either maintain the same levels of grazing as the preferred Alternative (Alternative A or No Action) or reduce grazing pressure to varying levels including 75% (9,432 AUMs) under Alternative B, 50% (19,388 AUMs) under Alternative E, and elimination of livestock grazing and related developments from the analysis area (Alternative D).

We recognize the challenges of managing resources on tracts of lands involving a mix of ownership, especially when addressing multiple statutory requirements to protect resources and restore the environment. Thus, we commend BLM for efforts in putting together the proposed MMP

Amendment/EIS, which can serve as a guide for future development of individual plans and projects. In addition, we note with appreciation that the MMP Amendment/EIS includes responses to public comments and that identification of planning criteria, significant issues, and alternative actions addressed in the Amendment/EIS considered inputs received from the public. The document also addresses many of the issues we raised during the scoping period, including cumulative and climate change effects.

Based on our review, we have assigned a rating of EC-2 (Environmental Concerns Insufficient Information) to the DEIS due largely to concerns about impacts to water quality and increased levels of grazing pressure anticipated to occur on the planning area that could exacerbate these impacts.

Because the draft MMP Amendment/EIS is not clear about the outcomes of previous management scenarios under the 2007 MMP/EIS, we recommend that the final MMP Amendment/EIS discuss the results of monitoring programs that tracked the results of management directions taken since 2007, and document adaptive management changes made and currently proposed, particularly in favor of sage grouse recovery and sustainability. The description of the affected environment should incorporate these conditions and outcomes. We would expect lessons learned from past practices and adaptive management efforts, combined with the need to account for new challenges e.g., climate change and fire frequency, would influence proposed management directions in this Amendment/EIS.

Since this Amendment is designed to address deficiencies in the 2007 MMP/EIS and determine lands to be made available to livestock grazing and with protections for greater sage grouse, BLM is proposing several action alternatives focused primarily on managing livestock grazing, while protecting sage-grouse and its habitat, including reduced-grazing and no-grazing alternatives. Of all action alternatives proposed, Alternative B appears to be environmentally preferable because this action includes considerable reduction of grazing pressure and at the same time increases resource recovery which would benefit sage grouse conservation as compared with the other grazing alternatives (A, C, and E). In particular, Alternative B would:

- Reduce AUMs allocated for livestock grazing by almost 75%.
- Close six areas to grazing (Little Park Kipuka, the North Pasture of Laidlaw Park Allotment, Larkspur Park Kipuka, the North Pasture of Bowl Crater Allotment, Park Field Kipuka, and a portion of the Craters Allotment).
- Make up to 21,000 acres unavailable for livestock grazing by adjust the boundary between Kimarna and Poison Lake allotments.
- Limit range improvements to net benefit to wildlife habitat.

As the draft MMP/EIS also indicates historic grazing on the monument has caused noticeable changes in plant community species composition, which still persist (p. xvi). Therefore, we believe Alternative B which emphasizes protection of Monument values and biological resources, including habitat values for sage-grouse would result in fewer impacts to resources in the planning area and lead to rapid resource recovery and improved overall ecosystem health and resiliency than the other grazing options.

Because of the proposed action's potential impacts to water quality within impaired creeks on the planning area, we recommend the following:

- Continued coordination with Idaho Department of Environmental Quality and Tribes affected by the proposed MMP Amendment to assure that state and tribal water resources are protected from livestock grazing impacts. The draft MMP Amendment/EIS indicates that Big Cottonwood Creek and Copper Creek, and grouped stream orders thereof, are identified as not supporting

beneficial uses and are listed under as such under CWA Section 303 (d). Several segments of Huff Creek may not be supporting beneficial uses due to a number of parameters including moderate to low total dissolved solids content, moderately high nutrient concentrations of total phosphorus, high concentrations of nitrate nitrogen, and low to moderate levels of fecal coliform with high fecal streptococcus bacteria (p. 79). Please also note that anti-degradation provisions of the Clean Water Act apply to those water bodies where water quality standards are currently met.

- Exclude or minimize grazing in wetland/riparian zones and consider taking additional early actions to address streams that have already been affected and are currently functioning at risk. Actions to increase shade and improve hydrologic functioning of streams would be beneficial. Similar actions would also benefit many riparian areas where most hydrologic impacts are found. Further protection of riparian areas may be warranted, especially around creeks on allotments that do not currently meet standards and guidelines (p. 124). Other beneficial actions would include use of aquatic Best Management Practices such as those prescribed in the USDA National BMPs for Water Quality on National Forest System Lands<sup>1</sup> and effective enforcement of grazing permit conditions.
- Continued coordination with the US Fish and Wildlife Service and, as appropriate, with the Idaho Department of Fish and Game to reduce risks to species and protect biota and habitat during implementation of the proposed livestock grazing. The draft MMP Amendment/EIS indicates threatened, endangered, and candidate species and associated habitats occur on the planning area (p. 99) including greater sage grouse. The final MMP Amendment/EIS should include any additional relevant information developed as a result of coordination with the agencies and recommended measures to protect species and their habitats.

We appreciate the opportunity to review this draft MMP Amendment/EIS. If you have questions about our comments, please contact me at (206) 553-1601 or by electronic mail at [littleton.christine@epa.gov](mailto:littleton.christine@epa.gov), or you may contact Theo Mbabaliye of my staff at (206) 553-6322 or electronic mail at [mbabaliye.theogene@epa.gov](mailto:mbabaliye.theogene@epa.gov).

Sincerely,



Christine B. Littleton, Manager  
Environmental Review and Sediment Management Unit

Enclosure:

1. US Environmental Protection Agency Rating System for Draft Environmental Impact Statements

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<sup>1</sup> [https://www.fs.fed.us/biology/resources/pubs/watershed/FS\\_National\\_Core\\_BMPs\\_April2012.pdf](https://www.fs.fed.us/biology/resources/pubs/watershed/FS_National_Core_BMPs_April2012.pdf)

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.